



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

by means of a passenger elevator, as is required of a carrier of passengers horizontally by means of railway cars or stage coaches, that is, the highest degree of care is required.

Party Walls—Use in Common.—Deere, Wells & Co. v. Weir-Sheegart Co., 59 N. W. Rep. 255. Where a wooden warehouse is framed against a brick wall in a permanent manner, even though its timbers are not let into the wall for support, nevertheless the attachment forms an enclosure and makes such a use in common of the wall that the owner is entitled to recover for its use and one-half value.

Railroad Company—Failure to Fence Tracks—Resulting Injuries to Employés.—Dickson v. Omaha & St. L. R.R. Co., 27 S. W. R. 476 (Missouri). Plaintiff's husband, an engineer, was killed by the overturning of locomotive, due to the locomotive running over a bull, which had strayed on to the track through a defective fence. It was held that though the statute requiring railroad corporations to fence their tracks, only in express terms gives to the owners of cattle or other animals killed or injured, in consequence of a neglect to perform this duty, a right of action, yet that the law was designed likewise for the protection and safety of the traveling public whether as passengers or employés. The duty of a master to his servant requires the exercise of reasonable care not only to provide safe, adequate and suitable machinery and appliances for his use, but also to keep the premises upon which he is required to work in a condition reasonably safe and secure for the performance of the duties required of him; and there seems to be no reason why, at common-law, the railroad company would not as well be required to use reasonable care to prevent obstructions in the shape of cattle on its tracks as to see that the ties and rails are sound.

Receivers—Deposits and Payments.—Eccles v. Drovers' & Mechanics Nat. Bank, 29 At. Rep. 963 (Md.). Where the money of an individual is deposited by the receiver of a corporation to his own credit, as receiver, the latter is justified in giving a check to the individual in payment of the obligation, as the corporation is liable for the same.

Statute of Frauds—Sufficiency of Memorandum.—Williams v. Smith, 37 N. E. Rep. 455 (Mass.). A letter which merely states the proposal and acknowledges the giving an option on certain land does